

EXHIBIT B

In Re: Bard IVC Filters Products Liability

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

NO. MD-15-92641-PHX-DGC

In re Bard IVC Filters Products
Liability Litigation

Videotaped Deposition of DEREK D. MUEHRCKE, M.D.,
taken on behalf of defendant herein, pursuant to Notice
of Taking Deposition, at 32 Avienda Menendez St., St.
Augustine, St. Johns County, Florida, on July 24, 2017,
at 9:00 a.m., before Terry T. Hurley, Registered
Professional Reporter, and Notary Public in and for the
State of Florida at Large.

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1 removal.

2 Q Well, in the case of Ms. Kruse you gave the
3 opinion that you did not think it could be -- the filter
4 could be percutaneously removed.

5 Do you believe there's a possibility that Ms.
6 Mulkey's can?

7 A I think it's more likely Ms. Mulkey's will be
8 able to be removed. I don't see the tip or cap outside
9 the vena cava in Ms. Mulkey.

10 Q So you think in Ms. Mulkey case the cap is
11 protruding outside the vena cava?

12 A No, I do not think the cap is tipping outside
13 the vena cava in Miss Mulkey. I think she'd be an
14 easier retrieval than Ms. Kruse would.

15 Ms. Kruse, I'm very dubious about the ability
16 to get that filter out.

17 Q And where -- what was your evidence of a
18 fracture with regard to Ms. Mulkey?

19 A I think she's missing -- one of the arms is
20 missing on her filter again.

21 MR. NORTH: Who just joined?

22 (David DeGreeff rejoined the deposition.)

23 Q And again, even though you believe a strut
24 fractured you do not know where that strut is located?

25 A I do not.

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1 Q And as a consequence, as with Ms. Kruse, you
2 are unable to say what sort of potential complications
3 if any might be associated with a fractured strut?

4 A That's correct.

5 MR. O'CONNOR: Object to the form of the
6 question.

7 Q Now, what organs were -- are the penetrating
8 struts close to or abutting?

9 A Well, they're interact with the duodenum
10 posteriorly, the L4 disk space, the L3-4 disk space, and
11 one close to but not touching her aorta.

12 Q With regard to the strut in the duodenum, is it
13 actually penetrating the duodenum, or is it just
14 adjacent to it?

15 A It's touching it. That's a question -- that
16 question is beyond the resolution of a CT scan.

17 Q Well, are you able to say one way or the other
18 whether Ms. Mulkey's history of gastrointestinal
19 difficulties are associated with the filter?

20 MR. O'CONNOR: Form.

21 A I think -- I think more likely than not I can
22 just say her back pain is associated with the filter. I
23 don't know about her gastrointestinal things. It's
24 possible you can have pain from the -- from the
25 intestine. I don't feel so comfortable saying that.